

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

May 1, 2012

TO: Internal File

THRU: April Abate, Team Lead *aaa 3/3/2012*

FROM: Priscilla Burton, Soils Reclamation Specialist *PWB by SAS*

RE: Savage Proposed Replacement Well (S-3-GW), Savage Industries Inc., Savage Coal Terminal ACT/007/022. Task 4077.

SUMMARY:

The Division requested a replacement well during the mid-term review (Task 3953). This amendment for a replacement well S-3-GW was received on April 6, 2012. The following statements are recommended to be included in the approval letter for S-3-GW:

“Plate 7-1 shows the S-3-GW well location in the northeast corner of the permit area. This area is within the ASCA Area #1 on Plate 7-2. Since vegetation is the key to water treatment for this ASCA, the disturbance associated with the drilling must be kept to a minimum and as such, topsoil salvage will not be required per **R645-301-232.400**. To ensure minimal destruction of vegetation during installation of S-3-GW, it is recommended that the Permittee use the adjacent road and turn-around as the staging area, and limit vehicle travel and parking on the well site in the ASCA to the drill rig. Drill cores should be removed from the ASCA area and taken to the refuse site. After completion of S-3-GW, compaction of the surrounding area from the work should be evaluated and the area should be scarified and seeded as determined necessary by the Division and the Permittee. If seeding is determined to be necessary, interim seed (Table 5-1) would be applied.”

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TECHNICAL ANALYSIS:

**OPERATION PLAN
TOPSOIL AND SUBSOIL**

Regulatory Reference: 30 CFR Sec. 817.22; R645-301-230.

Analysis:

The S-3-GW well location provided on Plate 7-1 shows the well locations in the northeast corner of the permit area. This area is within the ASCA Area #1 on Plate 7-2. Since vegetation is the key to water treatment for this ASCA, the disturbance associated with the drilling must be kept to a minimum and as such, topsoil salvage will not be required per **R645-301-232.400**, where the Division may not require the removal of topsoil for minor disturbances which:

232.410. Occur at the site of small structures, such as power poles, signs, or fence lines;

or

232.420. Will not destroy the existing vegetation and will not cause erosion.

It is recommended that the Permittee use the adjacent road and turn-around as the staging area, and limit vehicle travel and parking on the well site in the ASCA to the drill rig. Drill cores should be removed from the ASCA area and taken to the refuse site. Compaction from the work should be evaluated and the area should be scarified and seeded as determined necessary by the Division and the Permittee. If seeding is determined to be necessary, interim seed (Table 5-1) would be applied.

Finding:

The installation of the monitoring well S-3-GW meets the topsoil salvage exemption outlined by R645-301-232.400 which should be stated in the approval letter.

RECLAMATION PLAN

STABILIZATION OF SURFACE AREAS

Regulatory Reference: 30 CFR Sec. 817.95; R645-301-244.

Analysis:

After completion of S-3-GW, compaction of the surrounding area from the work should be evaluated and the area should be scarified and seeded as determined necessary by the Division and the Permittee. If seeding is determined to be necessary, interim seed (Table 5-1) would be applied.

Findings:

This condition meets the requirements for stabilization of surface areas and should be stated in the approval letter.

RECOMMENDATIONS:

An approval letter should specify the conditions set out in the summary of this document.

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